

# WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

3 Gannett Drive, White Plains, New York 10604-3407

Tel: (914) 323-7000 Fax: (914) 323-7001

*Albany • Baltimore • Boston • Chicago • Dallas • Garden City • Houston • Las Vegas • London • Los Angeles • McLean  
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www.wilsonelser.com

**Peter A. Meisels, Partner**  
Peter.Meisels@wilsonelser.com

May 16, 2008

**Via Facsimile and Regular Mail**  
(914) 390-4085

Hon. Charles L. Briant  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601

**MEMO ENDORSED**

*Application Granted  
to (Ordered)*

*May 19, 2008*

*Charles L. Briant*

*USDS*

Re: Araz Alali v. Alberto DeBara, individually, Kyle Wilson, individually,  
Edward Austin, individually, George Marshall, individually, Humberto  
Morrell, individually, Matthew Brady, individually, Anthony Murphy,  
individually, Robert Gazzola, individually, Patrick J. Carroll, individually,  
and the City of New Rochelle, New York

Index No.: 07 Civ. 2916

Our File No.: 07367.00059

Araz Alali v. City of New Rochelle

Index No.: 07 Civ. 9912

Our File No.: 07367.00068

Dear Judge Briant:

We represent the defendants in these federal civil rights actions which were consolidated for discovery purposes in your civil case discovery plan and scheduling order. The defendants intend to make a motion to dismiss the first captioned action on qualified immunity grounds. The Court has extended the defendants' time to do so until May 30, 2008.

Hon. Charles L. Brieant

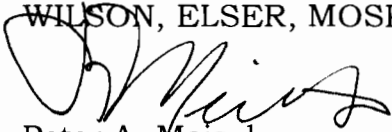
May 16, 2008

Page 2

With consent of plaintiff's counsel, Jonathan Lovett, we request that the last day to complete discovery in these consolidated matters be extended to a date 90-days after the Court's decision on the qualified immunity motion.

Respectfully yours,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

A handwritten signature in black ink, appearing to read "P. Meisels", is written over the firm name.

Peter A. Meisels

PAM:kt

cc: Jonathan Lovett, Esq. (via facsimile and regular mail)